UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JAMES HUGHES and MELISSA HUGHES	:	
and	:	
JOHN K. HUGHES and BEVERLY HUGHES	:	
Plaintiffs,	:	
v.	: : :	Civil Action No (Formerly pending as Case No.
UNITED PARCEL SERVICE, INC	: :	000605 June Term 2014 in the Court of Common Pleas of Philadelphia County)
and	:	i maaaapma eeamji)
INTERNATIONAL BROTHERHOOD of TEAMSTERS, LOCAL 623	: : :	

NOTICE OF REMOVAL

To the United States District Court, Eastern District of Pennsylvania, Defendant International Brotherhood of Teamsters, Local 623 (hereinafter, "Teamsters Local 623") respectfully shows:

Defendants.

- 1. The above-entitled action was filed in the Court of Common Pleas of Philadelphia County, on or about June 4, 2014. A true and correct copy of Plaintiff's Complaint is attached hereto as Exhibit 1.
 - 2. Defendant was served with Plaintiff's Complaint on or about June 17, 2014.
- 3. Plaintiff's Complaint alleges a breach of the duty of fair representation by Defendant Teamsters Local 623, and a breach of a collective bargaining agreement by Defendant United Parcel Service, Inc. (hereinafter, "UPS"). Plaintiffs assert that the Defendant UPS breached the collective bargaining agreement by failing to pay Plaintiffs James and John K.

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Hughes certain wages they claim they are entitled to receive, and that Defendant Teamsters

Local 623 failed to represent them by pursing their grievance. The grievance and arbitration

process is contained in a collective bargaining agreement between Defendants UPS and

Teamsters Local 623.

4. Plaintiffs' claims arise under 29 U.S.C. § 185, which provides that a suit for

violation of a collective bargaining agreement may be brought against a labor organization "in

any district court of the United States having jurisdiction of the parties, without respect to the

amount in controversy or without regard to the citizenship of the parties." Accordingly, removal

of this action is proper pursuant to 28 U.S.C. § 1441(a) and (b).

WHEREFORE, Defendant International Brotherhood of Teamsters Local 623 requests

that the above action now pending in the Court of Common Pleas of Philadelphia County, be

removed to this Court.

Respectfully submitted,

Dated: June 19, 2014

/S/ Neal Goldstein
NEAL GOLDSTEIN
PA Attorney I.D. No. 17589
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Attorney for Defendant International Brotherhood of Teamsters, Local 623

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 19th day of June 2014, a copy of the foregoing Notice of Removal was served by U.S. Mail on the following:

Matthew B. Weisberg, Esq. Weisberg Law, PC 7 S. Morton Avenue Morton PA 19070

Dated: June 19, 2014 /S/Neal Goldstein
NEAL GOLDSTEIN